

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

STATE OF MISSOURI, *et al.*,

*Plaintiffs,*

v.

JOSEPH R. BIDEN, JR., in his official  
capacity as President of the United States,  
*et al.*,

*Defendants.*

Case No. 4:24-cv-520-JAR

**DEFENDANTS' CONSENT MOTION FOR LEAVE TO FILE  
NOTICE OF SUPPLEMENTAL AUTHORITY**

Defendants respectfully request leave to file a notice of supplemental authority regarding a recent opinion in parallel litigation challenging the SAVE Plan, in which the U.S. District Court for the District of Kansas granted in part and denied in part Defendants' motion to dismiss. *See* Mem. & Order, *Kansas v. Biden*, No. 24-cv-1057, ECF No. 68, 2024 WL 2880404 (D. Kan. June 7, 2024). As good cause for this request, to which Plaintiffs consent, Defendants respectfully submit that some of the Article III standing issues discussed in the recent *Kansas* opinion are also relevant to the above-captioned matter, such that the Court might find it useful to read Judge Crabtree's analysis. The proposed notice of supplemental authority is attached to this motion.

Dated: June 10, 2024

Respectfully submitted,

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/s/ Stephen M. Pezzi  
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